

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,

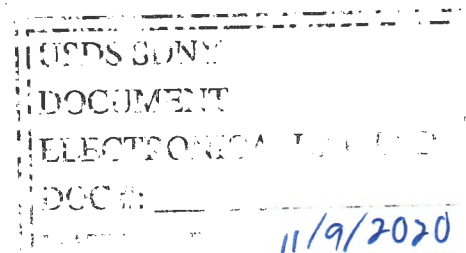
Plaintiff,

- against -

WILLIAM SADLEIR,

Defendants,

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Stipulation and [Proposed] Order

No. 20 Civ. 3997 (JGK)

WHEREAS, on October 2, 2020, the Government moved to intervene and for a full stay of the above-captioned case, in light of the pendency of the parallel criminal case *United States v. William Sadleir*, 20 Cr. 320 (PAE) (the “Criminal Case”), in which an indictment has been returned; and

WHEREAS, the Government has conferred with Matthew Schwartz, Esq., counsel to defendant William Sadleir in the Criminal Case, and reached agreement that a complete stay is appropriate;

WHEREAS, the Securities and Exchange Commission (the “SEC”) takes no position on the request for a stay; and

WHEREAS, the Court finds that a stay of this action is in furtherance of the public interest and will not prejudice any party; it is hereby

ORDERED that the Government’s motion to intervene is GRANTED. It is further

ORDERED that proceedings in this action are stayed in their entirety pending the conclusion of the Criminal Case, but without prejudice to any party’s right to make a subsequent application to lift the stay and resume proceedings based on changed circumstances. For avoidance

of doubt, the obligations to answer or otherwise respond to the complaint, motion practice, document discovery, and all depositions, interrogatories, requests for admission, issuance of subpoenas, third party discovery, and any other forms of discovery, including the parties' obligation to make disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(i), are hereby stayed in their entirety.

STIPULATED AND AGREED:

AUDREY STRAUSS
Acting United States Attorney

By: Jared Lenow
Jared Lenow
Assistant United States Attorney

D. B. Bliss
Dugan William Edward Bliss
Securities and Exchange Commission

/s Matthew Schwartz
Matthew Schwartz
Attorney for William Sadleir

SO ORDERED:

Dr. G. Koeltl
THE HONORABLE JOHN G. KOELTL
UNITED STATES DISTRICT JUDGE

11/9/20
DATE